

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CARPENTERS' DISTRICT COUNCIL OF
GREATER ST. LOUIS, et al.,

Plaintiffs,

v.

INDEPENDENT DRYWALL SYSTEMS, INC.,

Defendant.

Case No. 4:07CV290-ERW

STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Come now the parties and stipulate as follows:

1. Judgment shall be entered in favor of plaintiffs and against defendant Independent Drywall Systems, Inc. in the amount of \$130,250.65, which consists of delinquent contributions owed for the period October 8, 2006 through March 11, 2007 in the amount of \$99,022.27, liquidated damages in the amount of \$20,042.06, and interest in the amount of \$2,763.26.

2. Execution on the judgment amount set forth in paragraph 1, above, shall be stayed so long as defendant complies with paragraphs 3 and 4, below.

3. Defendant shall make payments to plaintiffs pursuant to the following schedule:

- 1) \$2,500.00 on or before April 12, 2007;
- 2) \$2,500.00 on or before May 12, 2007;
- 3) \$2,500.00 on or before June 12, 2007;
- 4) \$5,000.00 on or before July 12, 2007;
- 5) \$5,000.00 on or before August 12, 2007;
- 6) \$5,000.00 on or before September 12, 2007;
- 7) \$5,000.00 on or before October 12, 2007;
- 8) \$5,000.00 on or before November 12, 2007;
- 9) \$5,000.00 on or before December 12, 2007;
- 10) \$5,000.00 on or before January 12, 2008;
- 11) \$5,000.00 on or before February 12, 2008;

- 12) \$5,000.00 on or before March 12, 2008;
- 13) \$5,000.00 on or before April 12, 2008;
- 14) \$5,000.00 on or before May 12, 2008;
- 15) \$5,000.00 on or before June 12, 2008;
- 16) \$5,000.00 on or before July 12, 2008;
- 17) \$5,000.00 on or before August 12, 2008;
- 18) \$5,000.00 on or before September 12, 2008;
- 19) \$5,000.00 on or before October 12, 2008;
- 20) \$5,000.00 on or before November 12, 2008;
- 21) \$5,000.00 on or before December 12, 2008; and
- 22) \$1,522.27 on or before January 12, 2009.

4. Defendant shall submit its reports and contributions to the Carpenters Funds on or before the date due as set forth in the collective bargaining agreement to which defendant is party, or to which defendant becomes party during the period set forth in paragraph 3, above.

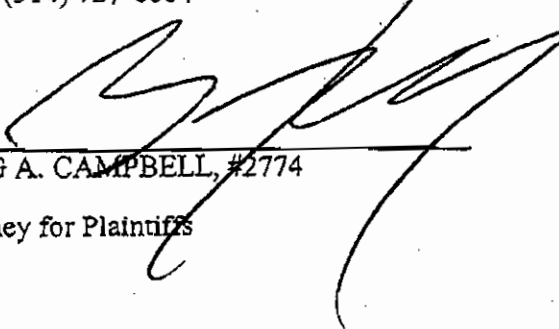
5. If defendant fails to make a payment when due pursuant to paragraph 3 above, or fails to submit its reports and contributions as required by paragraph 4, above, the entire judgment, less any payments made, shall become immediately due. If defendant complies with paragraphs 3 and 4, above, then payment of the amount referenced in paragraph 3 shall satisfy this judgment.

6. The parties acknowledge that this Stipulation is based upon unaudited reports submitted by defendant, and that if plaintiffs discover through an audit of defendant's records that additional amounts are owed, then plaintiffs shall be entitled to pursue the collection of such amounts.

WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

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INDEPENDENT DRYWALL SYSTEMS
1 Lone Eagle Trail
St. Charles, Missouri 63303


GREG A. CAMPBELL, #2774

Attorney for Plaintiffs

By: 

Printed Name: Michael J. Treiber

Title: President

SO ORDERED:


U.S. DISTRICT COURT JUDGE

Date: May 29, 2007